

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Vincent M. Wendowski,

*Debtor.*

Case No. 24-11587  
Chapter 13

**Debtor's Application to Employ  
Century 21 The Real Estate Store as Debtor's Real Estate Agent**

**AND NOW**, Debtor Vincent M. Wendowski, by and through his attorney, applies to this Court for entry of an order authorizing employment of a professional in accordance with L.B.R. 2014-1. In support of this application, the Applicant states as follows:

1. The Debtor has filed a plan that proposes to pay creditors by selling his real property located at 1030 Chestnut Street, Trainer, PA 19061.
2. Employment of a realtor is necessary for the Debtor to adequately perform his duties as a debtor.
3. The Debtor wishes to employ Century 21 The Real Estate Store ("the Proposed Realtor") as his real estate agent for that purpose.
4. The Proposed Realtor has agreed to render professional services for the debtor in return for compensation as set forth in the contract attached as Exhibit A.
5. Upon information and belief, the Proposed Realtor has no connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

6. Upon information and belief, the Proposed Realtor does not hold an adverse interest to the estate, does not represent an adverse interest to the estate, and does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which they will be retained under 11 U.S.C. § 327(a).

For those reasons, the Debtor requests that the Court grant relief in the form of order attached, and further in his favor if necessary and proper under the law.

Date: September 11, 2024

SADEK LAW OFFICES, LLC  
*Attorney for Debtor*

By: /s/ Brad J. Sadek, Esq.

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### Certificate of Service

I certify that on this date I caused this document and all attachments to be served on all parties on the Clerk's service list through the CM/ECF system by electronic means.

Date: September 11, 2024

/s/ Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.